Remarks

Claims 1-2, 4-13, 15-32, 34-50, and 52-55 are pending, and claims 1-2, 4-13, 15-32, 34-50, and 52-55 are rejected. Claims 1-2, 4-13, 15-32, 34-50, and 52-55 are cancelled without prejudice by this Response in addition to claims 2, 13, and 32 previously cancelled. The Applicants added claims 56-75 which do not comprise new matter. The Applicants respectfully request allowance of claims 56-75.

§ 102 Rejection

Claims 1-2, 4-13, 15-32, 34-50, and 52-55 stand rejected under 35 U.S.C. §102(e) over U.S. Patent Application Publication 2001/0017861 (Allen). The Applicants cancelled claims 1-2, 4-13, 15-32, 34-50, and 52-55, and added claims 56-75. Therefore, the current rejection under Allen is moot. The Applicants will therefore show that Allen does not anticipate new claims 56-75.

First, independent claim 56 describes an *asynchronous matrix* that routes communications from one connection to another connection based on a control message. A matrix is a *device* that switches communications from one connection to another connection. In rejecting the asynchronous transfer mode (ATM) matrix in previous claim 1, the Examiner cited FIG. 5 and items 26 and 28. FIG. 5 and items 26 and 28 illustrate an ATM network (26) with interworking functions (28). The ATM network includes a plurality of ATM switches. The ATM network and interworking functions operate as follows. An end office switch transmits voice from an originating location to an originating trunk. The first interworking function (28) converts the originating trunk to ATM cells. The ATM cells are then routed through the ATM network to the second interworking function (28). The second interworking function (28) converts the ATM cells to a destination trunk, and transmits the voice over the destination trunk to a destination.

The Applicants submit that the ATM network in Allen does not teach an asynchronous matrix as provided in claim 56. An ATM network is a network of ATM switches connected by links. An asynchronous matrix is a device having the functionality to switch communications from one connection to another connection. One

of the ATM switches in the ATM network of Allen may have a matrix, but Allen does not teach using an asynchronous matrix as in claim 56.

Second, claim 56 describes a *signaling processor* that processes call signaling to select an ATM connection for the user communications, and transmits a control message identifying the selected ATM connection to the asynchronous matrix. In rejecting the signaling processor in previous claim 1, the Examiner cited the CS-IWF (30) described in Allen. The CS-IWF in Allen processes call signaling to convert the call signaling from one protocol to another protocol. The CS-IWF in Allen does not process call signaling to select an ATM connection for user communications as provided in claim 56. The CS-IWF just converts signaling between protocols and does not select connections for user communications. If anything, the originating end office (20) in Allen selects a trunk, and the CS-IWF (30) translates the trunk ID in the call signaling into an ATM connection ID (see Fig. 4). The Applicants submit that the CS-IWF in Allen does not process signaling to select a connection as described in claim 56.

On page 2 of the Office action, the Examiner commented on the teaching of Allen in regard to the signaling processor. The Examiner states that Allen does not specifically disclose a signaling processor, but Allen appears capable of performing the function of a signaling processor (as described in claim 56) as a broadband call server. First, if Allen does not disclose a signaling processor as claimed, the Allen cannot anticipate the claims. Second, the statement that the CS-IWF could comprise a call server adds nothing to the Examiner's argument. If the CS-IWF does comprise a call server, the call server would still operate as described in Allen to convert SS7 signaling to ATM signaling. There is still no functionality in the CS-IWF for selecting an ATM connection based on signaling. Therefore, the Applicants submit that Allen does not teach a signaling processor as described in claim 56.

The above remarks clearly show that Allen does not anticipate new claims 56-75.

Conclusion

Based on the above remarks, the Applicants submit that claims 56-75 are allowable over Allen. The Applicants submit that there may be additional reasons in support of patentability, but that such reasons are moot in light of the above remarks and are omitted

in the interests of brevity. The Applicants respectfully request allowance of claims 56-75.

SIGNATURE OF PRACTITIONER

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